

From: Strauss, Linda [Strauss.Linda@epa.gov]
Sent: 6/18/2019 2:37:51 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]
CC: Abboud, Michael [abboud.michael@epa.gov]; Drinkard, Andrea [Drinkard.Andrea@epa.gov]; Grantham, Nancy [Grantham.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Bennett, Tate [Bennett.Tate@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]
Subject: RE: due today - FW: LINDA/OPP: The Hill - bee thing

Ex. 5 Deliberative Process (DP)

From: Dunn, Alexandra
Sent: Tuesday, June 18, 2019 10:31 AM
To: Strauss, Linda <Strauss.Linda@epa.gov>
Cc: Abboud, Michael <abboud.michael@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Bennett, Tate <Bennett.Tate@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
Subject: Re: due today - FW: LINDA/OPP: The Hill - bee thing

Ex. 5 Deliberative Process (DP)

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, DC

Sent from my iPhone

On Jun 18, 2019, at 9:47 AM, Strauss, Linda <Strauss.Linda@epa.gov> wrote:

Ex. 5 Deliberative Process (DP)

<https://thehill.com/policy/energy-environment/448970-epa-will-allow-use-of-pesticide-harmful-to-bees>

Linda

From: Bennett, Tate
Sent: Monday, June 17, 2019 9:58 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>
Cc: Strauss, Linda <Strauss.Linda@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Altieri, Sonia <Altieri.Sonia@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Abboud, Michael <abboud.michael@epa.gov>
Subject: Re: due today - FW: LINDA/OPP: The Hill - bee thing

Ex. 5 Deliberative Process (DP)

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On Jun 17, 2019, at 7:38 PM, Dunn, Alexandra <dunn.alexandra@epa.gov> wrote:

This is the previously-approved desk statement. Rick just OKed that it is still up-to-date. This published in the FR today. Just rec'd and due today.

RESPONSE:

EPA has completed review of emergency exemption requests from several states for the use of sulfoxaflor to control tarnished plant bugs on cotton and/or sugarcane aphids on sorghum. The exemptions will authorize treatment of defined geographic areas within each state for a finite period of time.

This decision is based in part on information from the states demonstrating an urgent need and a lack of available alternatives to address the pest pressures within their states. Mitigation measures will be put in place to minimize exposure and reduce the potential for unreasonable risks to the environment. The approvals include advisory guidance for protecting bees, and users must also follow all existing EPA guidance for pollinator protection.

In the past, states have not used all the acres applied for in their emergency exemptions. For example, in 2018, while Texas was approved for 3 million acres, their growers only used sulfoxaflor on 139,397 acres.

Section 18 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) authorizes EPA to allow emergency exemptions for unregistered uses of pesticides to address emergency conditions. EPA evaluates requests for FIFRA Section 18 emergency

exemptions in accordance with the statutory criteria of FIFRA and the Federal Food, Drug and Cosmetic Act (FFDCA).

EPA assesses all requests for emergency exemption for human and environmental safeguards consistent with these statutory requirements. In addition, each emergency exemption decision details the conclusions of EPA's assessment and the public safety requirements to support the approved use. Thus the decision to authorize an emergency exemption under FIFRA Section 18 ensures that the pesticide can be used safely, in accordance with federal law.

The human health and environmental risk assessments that are done for all Section 18 exemptions are based on the best available data and assessment procedures and require the same safety findings as for uses covered by Section 3 registrations.